

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

FANGMAN, et al.,	:	CASE NO. 1:15-cv-792
Plaintiffs,	:	Judge Susan J. Dlott
v.	:	STIPULATION CONCERNING
EMERY FEDERAL CREDIT UNION,	:	PROTECTION OF NON-PARTY
Defendant.	:	BORROWER INFORMATION
	:	
	:	

Plaintiffs Gary and Ann Ratcliff, Shelly and Frank Palombaro, Melinda and David Alvarado, and Kevin and Jennifer McAlpin (“Plaintiffs”) and Defendant Emery Federal Credit Union (“Defendant,” and collectively, the “Parties”), by their counsel, stipulate as follows:

1. This Stipulation is entered into with reference to the Stipulated Protective Order for the Protection of Confidential Information (the “Protective Order”) signed by the Court on March 9, 2016 (Dkt. No. 233).
2. The Parties agree to add an additional category of documents and information that may be designated as Confidential pursuant to the Protective Order. Such documents or information, to be designated “Highly Confidential,” shall be subject to all of the same restrictions as are imposed on Confidential documents or information pursuant to the Protective Order, as well as the additional restrictions listed herein.
3. Documents or information designated as “Highly Confidential” may be shown to or discussed with the Parties, but may not be left or maintained in the Parties’ possession unless specifically agreed in writing by the designating Party as to specific documents or information. Rather, documents or information designated as “Highly Confidential” shall be maintained by

the Parties' outside counsel, including vendors retained by outside counsel. Provided, however, that Emery's counsel may provide information concerning Emery borrowers' loans—but not borrowers of other companies—to Emery personnel who are assisting with the defense of this Action.

4. The Parties and their counsel may not use the identities of or any non-public personal information concerning borrowers or consumers who are not parties to this Action, obtained from documents designated as “Highly Confidential,” for any purpose outside of this litigation or the Maryland Action, and such documents will not be used to contact or solicit any such person except by leave of the Court in this Action.

5. It is anticipated that the “Highly Confidential” designation will be used for documents or information concerning borrowers or consumers who are not parties to this Action.

6. This stipulation is entered into in order to facilitate discovery in this Action and is made without any waiver by either Party except as expressly set forth herein.

Dated: October 26, 2016

Respectfully submitted,

/s/ Gregory M. Utter

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Attorneys for Defendants

SO ORDERED:

Dated: 10/26/16

Karen L. Litkovitz
Karen L. Litkovitz
United States Magistrate Judge